

PAUL ZIEGLER (0012364)
 McNeal, Schick, Archibald, & Biro Co., L.P.A.
 123 West Prospect Avenue, Suite 250
 Cleveland, Ohio 44115
 216-621-9870
 Fax: 216-522-1112
 Email: ziggy@msablaw.com
 Attorney for Defendant Caribbean Cruise Line, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF OHIO-EASTERN DIVISION**

Case No. Case No. 1:14-cv-01374-DCN

ANTHONY REO; AND BRYAN
 REO, INDIVIDUALLY AND ON
 BEHALF OF ALL OTHERS
 SIMILARLY SITUATED,
 Plaintiffs,
 vs.
 CARIBBEAN CRUISE LINE, INC.,
 Defendants.

**MOTION TO ADMIT COUNSEL PRO
 HAC VICE**

PLEASE TAKE NOTICE that upon the annexed Declaration of Richard W. Epstein, Esq., in support of this Motion, we will move this Court pursuant to Rule 83.5(h) of the Local Civil Rules of the United States District Court for the Northern District of Ohio for an Order allowing the admission of Richard W. Epstein, Esq., a Shareholder of the firm of Greenspoon Marder, P.A. and a member of good standing of the Bar of the State of Florida, as attorney pro hac vice to argue or try this case in whole or in part as counsel for Defendant Caribbean Cruise

1 Line, Inc.¹ There are no pending disciplinary proceedings against him in any State or Federal
2 court.

3 Respectfully submitted,

4 **MCNEAL, SCHICK, ARCHIBALD & BIRO**
5 **CO., L.P.A.**

6 /s/Paul W. Ziegler

7 PAUL W. ZIEGLER (0012364)

8 ziggy@msablaw.com

9 123 West Prospect Avenue, Suite 250

10 Cleveland, OH 44115

11 (216) 621-9870

12 *Attorney for Defendant*

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23 ¹. By filing this Motion for Pro Hac Vice Admission, the Defendant does not waive
24 any defense under Rule 12 of the Federal Rules of Civil Procedure, including the defense of lack
of personal jurisdiction.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification on this Wednesday, August 06, 2014.

Abbas Kazerounian, Esq.
ak@kazlg.com
Matthew M. Loker, Esq.
ml@kazlg.com
KAZEROUNI LAW GROUP, APC
120 S. LaSalle Street, Suite 1800
Chicago, Illinois 60603-3593
(800) 400-6808
(800) 520-5523 (FAX)

Joshua B. Swigart, Esq.
josh@westcoastlitigation.com
HYDE & SWIGART
2221 Camino Del Rio South, Suite 101
San Diego, CA 92108
(619) 233-7770
(619) 297-1022 (FAX)

Todd M. Friedman, Esq.
tfriedman@attorneysforconsumers.com
LAW OFFICES OF TODD M. FRIEDMAN, P.C.
369 S. Doheny Dr., #415
Beverly Hills, CA 90211
(877) 206-4741
(866) 633-0228 (FAX)
Attorney for Plaintiff Anthony Reo

/s/Paul W. Ziegler
PAUL W. ZIEGLER (0012364)

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McNeal, Schick, Archibald, & Biro Co., L.P.A.
123 West Prospect Avenue, Suite 250
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216-621-9870
Fax: 216-522-1112
Email: ziggy@msablaw.com
Attorney for Defendant Caribbean Cruise Line, Inc.

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ANTHONY REO; AND BRYAN)
REO, INDIVIDUALLY AND ON)
BEHALF OF ALL OTHERS)
SIMILARLY SITUATED,)
Plaintiffs,)
vs.)
CARIBBEAN CRUISE LINE, INC.,)
Defendants.)

**DECLARATION IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC*
*VICE***

Pursuant to 28 U.S.C. § 1746, I, Richard W. Epstein, Esq., declare as follows:

1. My full name is Richard W. Epstein.
2. I am a Shareholder with the law firm of Greenspoon Marder, P.A.
3. I practice under the following firm name or letterhead:

Greenspoon Marder, P.A.
200 East Broward Boulevard
Suite 1800
Fort Lauderdale, Florida 33301
Telephone Number: (954) 491-1120
Facsimile: (954) 343-6952
Email address: Richard.Epstein@gmlaw.com

1 4. I submit this declaration in support of my Motion for Admission to Practice Pro
2 Hac Vice in the above captioned matter.

3 5. I was admitted to practice in the Florida State Court on May 30, 1977. My Florida
4 Bar Registration number is 229091.¹

5 6. There are no pending disciplinary proceedings against me in any court,
6 department, bureau or commission of any State or the United States, nor have I ever been
7 disbarred or suspended from practice or received any reprimand from any such court,
8 department, bureau or commission pertaining to conduct or fitness as a member of the bar.

9
10 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury and of the laws of the United
11 States that the foregoing is true and corrected.

12 Dated this 6 day of August, 2014.

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14 
15 _____
16 RICHARD W. EPSTEIN, ESQ.
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23 _____
24 ¹ Attached hereto is a copy of the Certificate of Good Standing from the Florida Bar.



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
www.FLORIDABAR.org

State of Florida)

County of Leon)

In Re: 229091
 Richard Wayne Epstein
 Greenspoon Marder, P.A.
 200 E. Broward Blvd., Ste. 1500
 Fort Lauderdale, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on May 31, 1977.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this 9th day of July, 2014.

A handwritten signature in black ink, appearing to read "Pam Gerard".

Pam Gerard
Member Services & Records Manager
The Florida Bar

PG/CL:ksw1:R10